

**MATTHEW T. GREGORY**

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*Attorneys for World Corporation*

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

YU SUK CHUNG,

Plaintiff,

**VS.**

WORLD CORPORATION,

**Defendant.**

Civil Action No. 04-00001

**DECLARATION OF  
MATTHEW T. GREGORY IN  
SUPPORT OF MOTION FOR COSTS**

DATE: FEB 16 2006

TIME: 8:30am

**I, Matthew T. Gregory, hereby declare as follows:**

1. I am one of the attorneys of record for Defendant World Corporation in this case. I make this declaration based on my personal knowledge and I am competent to testify to the matters set forth herein.

1           2.     Attached hereto as Exhibit "A" is a true and accurate copy of the Offer of Judgment  
2                 served on Plaintiff on October 14, 2005.

3           3.     Attached hereto as Exhibit "B" is a true and accurate copy of Defendant's Certificate  
4                 of Service for the October 14, 2005 Offer of Judgment.

5  
6           I declare under penalty of perjury that the foregoing is true to the best of my knowledge  
7     and belief.

8           Executed this 22<sup>nd</sup> day of December, 2005.

9  
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11                                   
12                                 MATTHEW T. GREGORY

**MATTHEW T. GREGORY, ESQ.**

Attorney at Law

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**IGNACIO C. AGUIGUI, ESQ.**

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*Attorneys for Defendant World Corporation*

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE**

**NORTHERN MARIANA ISLANDS**

**YU SUK CHUNG,**

Plaintiff,

vs.

**WORLD CORPORATION,**

Defendant.

CIVIL CASE NO. **04-00001**

**OFFER OF JUDGMENT**

**EXHIBIT**

**A**

1 **TO: PLAINTIFF AND HIS ATTORNEY OF RECORD:**

2  
3 Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant hereby offers to  
4 allow judgment to be taken against it in this action, in the amount of One Hundred Seventy Five  
5 Thousand U.S. Dollars (\$175,000.00). It is explicitly stated that this Offer of \$175,000.00  
6 includes costs and therefore, a judgment based on this Offer will not include any additional  
7 amount for costs. *Marek v. Chesny*, 473 U.S. 1, 6, 87 L.ED 2d 1, 6, 105 S.Ct. 3012, 3015 (1985).

8 This Offer of Judgment is made for the purposes specified in Rule 68 and is not be  
9 construed either as an admission that the Defendants are liable in this action, or that the Plaintiff  
10 has suffered any damages.

11 DATED this 14th day of October, 2005.

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13 **MATTHEW T. GREGORY, ESQ.**  
14 **LUJAN UNPINGCO AGUIGUI & PEREZ LLP**

15 By: 

16 **MATTHEW T. GREGORY, ESQ.**  
17 **Attorneys for World Corporation**  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS**

YU SUK CHUNG,

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vs.

WORLD CORPORATION,

Defendant.

Civil Action No. 04-00001

**CERTIFICATE OF SERVICE**


I, Maricar M. Guintu certify that on October 14, 2005, a true and correct copy of the Defendant's Offer of Judgment in this action was served via facsimile at 4:38 p.m. and hand deliver at 5:15 p.m. to:

**EXHIBIT**

B

1 COLIN M. THOMPSON  
2 Attorney at Law  
3 J.E. Tenorio Building  
4 Middle Road, Gualo Rai  
5 PMB 917, Box 10001  
6 Saipan, MP 96950

7  
8 Dated this 17<sup>th</sup> day of October, 2005.  
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MARICAR M. GUINTU